

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

CAIR FOUNDATION, INC., d/b/a  
COUNCIL ON AMERICAN-ISLAMIC  
RELATIONS & CAIR,

Plaintiff,

v.

ASMA LORI HAIDRI SAROYA a.k.a. LORI  
SAROYA, ASMA SAROYA, LORI HAIDRI,  
LORI HAIDRI-SAROYA, & LH,

Defendant.

Civil Action No.: 0:21-cv-01267 (SRN/TNL)

**STATEMENT REGARDING  
CONFIDENTIALITY RELATING TO  
CAIR'S MEMORANDUM IN  
OPPOSITION TO DEFENDANT'S  
MOTION FOR DECLARATION THAT  
NO PRIVILEGE EXISTS**

Plaintiff CAIR Foundation Inc. ("CAIR") submits the following Statement Regarding Confidentiality pursuant to Minn. L.R. 5.6(d)(1)(A)(ii). CAIR submits the Memorandum in Opposition to Defendant's Motion for Declaration that No Privilege Exists. The Memorandum discusses a document that is confidential and protected from disclosure pursuant to the attorney-client privilege. All Exhibits attached to the Memorandum discuss the privileged communication. Accordingly, CAIR is filing the Memorandum and its Exhibits under temporary seal. Under the circumstances, it would be impracticable to file the Memorandum and its Exhibits in redacted form.

Dated: November 30, 2021

**CHRISTENSEN LAW OFFICE PLLC**

By Carl E. Christensen (MN #0350412)  
800 Washington Avenue North, Suite 704  
Minneapolis, MN 55401  
Telephone: (612) 823-4016  
Facsimile: (612) 823-4777  
Email: carl@clawoffice.com

and

**RUBIN FORTUNATO & HARBISON, P.C.**



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Michael J. Fortunato (*admitted pro hac vice*)  
Cynthia B. Morgan (*admitted pro hac vice*)  
1200 Liberty Ridge Drive, Suite 220  
Wayne, PA 19087  
Telephone: (610) 408-2005/2022  
Facsimile: (610) 408-9000  
Email: mfortunato@rubinfortunato.com  
Email: cmorgan@rubinfortunato.com

*Attorneys for Plaintiff CAIR Foundation, Inc., d/b/a  
Council on American-Islamic Relations, & CAIR*